

EXHIBIT I

Keith Flynn

From: Keith Flynn
Sent: Thursday, March 26, 2015 11:56 AM
To: 'Miglio, Terrence J.'
Cc: 'bebuchanan@varnumlaw.com'
Subject: RE: Reeser
Attachments: STIPULATED ORDER RE HOOD.docx

Terrence:

I have attached the draft stipulated order regarding Ms. Hood's deposition. Please state whether you concur and provide me with authority to sign on your behalf.

Thank you.

- Keith

From: Keith Flynn
Sent: Thursday, March 26, 2015 11:22 AM
To: 'Miglio, Terrence J.'
Cc: 'bebuchanan@varnumlaw.com'
Subject: RE: Reeser

I just spoke with your paralegal, Joanne, regarding the matter discussed below. She indicated that the deposition of Ms. Hood is not going tomorrow. She told me that you were going to get additional dates of availability and that you were agreeable to a stipulated order extending discovery for the sole purpose of taking Ms. Hood's deposition.

I will forward the draft stipulated order to you later today.

Also, I have not heard back regarding the stipulated protective order. Obviously, the discovery cutoff is soon approaching. I will need a decision on that issue sooner rather than later.

- Keith

From: Keith Flynn
Sent: Thursday, March 26, 2015 9:55 AM
To: 'Miglio, Terrence J.'
Cc: 'bebuchanan@varnumlaw.com'
Subject: RE: Reeser

Terrence:

I have a court reporter waiting on standby. I would like to accommodate Ms. Hood's schedule as much as possible and I certainly hope to provide the court reporter with notice of this change as soon as possible. However, I cannot reschedule Ms. Hood's deposition without your confirmation that I will be able to depose Ms. Hood on another mutually convenient date without running afoul of the Court's Scheduling Order. I need an answer as soon as possible regarding Ms. Hood's availability or Defendant's willingness to sign a stipulated order today extending the discovery period for the sole purpose of taking Ms. Hood's deposition.

If I do not hear back from you by 2pm, I cannot reschedule the deposition. I will continue under the assumption that Ms. Hood will appear for the full-day deposition scheduled for tomorrow that I requested over a month ago.

Please advise.

Thanks.

- Keith

From: Miglio, Terrence J. [mailto:tjmiglio@varnumlaw.com]
Sent: Wednesday, March 25, 2015 12:23 PM
To: Keith Flynn
Subject: RE: Reeser

I will check with her for her availability.

Terrence J. Miglio, Esq.
Direct: (248) 567-7828
Cell: (248) 408-2938



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From: Keith Flynn [mailto:kflynn@millercohen.com]
Sent: Wednesday, March 25, 2015 12:21 PM
To: Miglio, Terrence J.
Subject: RE: Reeser

My schedule is incredibly busy in the next couple of weeks—I have an arbitration hearing coming up the first week of April. The only day that I am available next week without rescheduling other meetings is Monday. However, I am definitely going to need a full day with Ms. Hood. Please let me know if Monday works.

Thanks.

- Keith

From: Miglio, Terrence J. [mailto:timiglio@varnumlaw.com]
Sent: Wednesday, March 25, 2015 10:21 AM
To: Keith Flynn
Subject: Reeser

Jill Hood informs me that she is only available Friday morning. She said she can start early on that day. I am trying to reach her to see her actual availability that day. If Friday morning starting early won't provide you with enough time I will get alternate dates from her but it would be easier if you let me know your availability.

Terrence J. Miglio, Esq.
Direct: (248) 567-7828
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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

NATALIE REESER,

Plaintiff,

v.

HENRY FORD HOSPITAL,

Defendant.

Case No.: 2:14-cv-11916-GCS-MJH

Hon. George Caram Steeh
Magistrate Judge Michael Hluchaniuk

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STIPULATED ORDER TO ADJOURN SCHEDULING ORDER DATES

Plaintiff Natalie Reeser and Defendant Henry Ford Hospital stipulate as follows:

Currently, the deadline for discovery is currently set for April 6, 2015 pursuant to Dkt. No. 22. Plaintiff noticed and subpoenaed Jill Hood to appear for her deposition on March 23, 2015. This date was re-noticed for March 27th

pursuant to an agreement between the attorneys to instead depose Ms. Reeser on March 23rd. Ms. Hood's deposition must be rescheduled because she is no longer available on March 27th.

The parties are currently in the process of rescheduling Ms. Hood's deposition for a mutually convenient time, but believe that an extension of discovery is necessary for the sole purpose of deposing Ms. Hood to accommodate the schedules of the parties, their attorneys, and the witness.

IT IS SO ORDERED that the discovery deadline in Dkt. No. 22 is extended until May 6, 2015 for the sole purpose of taking Ms. Hood's deposition.

Dated: _____

HON GEORGE CARAM STEEH

STIPULATED AS TO FORM AND SUBSTANCE:

MILLER COHEN P.L.C.

VARNUM LLP

By: /s/Keth D. Flynn
Keith D. Flynn (P-74192)

By: /s/Terrence J. Miglio (w/consent)
Terrence J. Miglio (P-30541)